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14 CASUALTY COMPANY OF READING, PA; and NATIONAL UNION FIRE INSURANCE  
15 COMPANY OF PITTSBURGH, PA

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

18 UNITED STATES of AMERICA for the Use  
19 and Benefit of WEBCOR CONSTRUCTION,  
20 INC. dba WEBCOR BUILDERS, and  
21 WEBCOR CONSTRUCTION, INC. dba  
22 WEBCOR BUILDERS,

23 Plaintiffs,

24 vs.

25 DICK/MORGANTI, a joint venture; DICK  
26 CORPORATION; THE MORGANTI  
27 GROUP; AMERICAN CASUALTY  
28 COMPANY OF READING, PA;  
NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA, and  
DOES 1 through 10, inclusive,

Defendants.

Case No.: 3:07-CV-02564-CRB  
Consolidated with:  
Case No: 3:07-CV-07-04180 EDL

**DECLARATION RE: FILING AND  
SERVICE OF GLOBAL CLAIM**

LAW OFFICES

**Peckar &  
Abramson**

A Professional Corporation

DECLARATION RE: FILING AND SERVICE OF GLOBAL CLAIM

Case No.: 3:07-CV-02564-CRB  
3:07-CV-07-04180 EDL

1 AND ALL RELATED COUNTER-CLAIMS  
2 AND THIRD-PARTY COMPLAINTS.  
3

4 I, Michael T. Ambroso, declare as follows:

5 1. I am the Assistant General Counsel and Assistant Secretary for Defendant Dick  
6 Corporation. Dick Corporation is the managing partner of Defendant Dick/Morganti, A Joint  
7 Venture formed between Dick Corporation and Defendant Morganti Texas, Inc.  
8 Dick/Morganti's sureties for the construction project which is the subject matter of this lawsuit  
9 are Defendant American Casualty Company of Reading, PA ("American") and National Union  
10 Fire Insurance Company of Pittsburgh, PA ("National").

11 2. Pursuant to the Court's October 19, 2007 Stay Order and October 30, 2007  
12 Supplemental Order, on November 30, 2007, Dick/Morganti submitted its Global Claim to the  
13 Contracting Officer of the U.S. General Services Administration for the construction project  
14 known as the New San Francisco Federal Building located on the corner of 7<sup>th</sup> and Mission  
15 Streets in San Francisco.

16 3. The Global Claim, with exhibits, is contained in six(6) volumes and is  
17 approximately 2,500 pages long. Copies of the Global Claim are being arranged and will be sent  
18 to counsel for Plaintiff Webcor and the Third Party Defendants in this action on or before  
19 December 6, 2007.

20  
21 I declare under penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct.

23 Executed this 3rd day of December, 2007 at Pittsburgh, Pennsylvania.  
24

25   
26 Michael T. Ambroso  
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